EPA

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Comprehensive Assessment Information Rule

REPORTING FORM

90-930000010

EPA-OTS

0007870245

When completed, send this form to:	For Agency Use Only:
Document Processing Center Office of Toxic Substances, TS-790 U.S. Environmental Protection Agency 401 M Street, SW Washington, DC 20460 Attention: CAIR Reporting Office	Date of Receipt: _____ Document Control Number: _____ Docket Number: _____

EPA Form 7710-52

SECTION 1 GENERAL MANUFACTURER, IMPORTER, AND PROCESSOR INFORMATION

PART A GENERAL REPORTING INFORMATION

1.01 This Comprehensive Assessment Information Rule (CAIR) Reporting Form has been completed in response to the Federal Register Notice of..... [0][6] [1][4] [8][9]
mo. day year

CBI

[ ] a. If a Chemical Abstracts Service Number (CAS No.) is provided in the Federal Register, list the CAS No. ..... [ ][ ][ ][ ][ ][ ]-[ ][ ]-[ ]

b. If a chemical substance CAS No. is not provided in the Federal Register, list either (i) the chemical name, (ii) the mixture name, or (iii) the trade name of the chemical substance as provided in the Federal Register.

(i) Chemical name as listed in the rule ..... Toluene 2,4 DIISOCYANATE

(ii) Name of mixture as listed in the rule .... N/A

(iii) Trade name as listed in the rule ..... EN 9 OZR PART A

c. If a chemical category is provided in the Federal Register, report the name of the category as listed in the rule, the chemical substance CAS No. you are reporting on which falls under the listed category, and the chemical name of the substance you are reporting on which falls under the listed category.

Name of category as listed in the rule ..... N/A

CAS No. of chemical substance ..... [ ][ ][ ][ ][ ][ ]-[ ][ ]-[ ]

Name of chemical substance ..... N/A

1.02 Identify your reporting status under CAIR by circling the appropriate response(s).

CBI

Manufacturer 1

[ ] Importer 2

Processor ..... (3)

X/P manufacturer reporting for customer who is a processor 4

X/P processor reporting for customer who is a processor 5

[ ] Mark (X) this box if you attach a continuation sheet.

1.07 Exemptions From Reporting -- If you have provided EPA or another Federal agency with the required information on a CAIR Reporting Form for the listed substance within the past 3 years, and this information is current, accurate, and complete for the time period specified in the rule, then sign the certification below. You are required to complete section 1 of this CAIR form and provide any information now required but not previously submitted. Provide a copy of any previous submissions along with your Section 1 submission. N/A

CBI

[ ]

"I hereby certify that, to the best of my knowledge and belief, all required information which I have not included in this CAIR Reporting Form has been submitted to EPA within the past 3 years and is current, accurate, and complete for the time period specified in the rule."

NAME	SIGNATURE	DATE SIGNED
TITLE	(_____) _____ - _____ TELEPHONE NO.	DATE OF PREVIOUS SUBMISSION

1.08 CBI Certification -- If you have asserted any CBI claims in this report you must certify that the following statements truthfully and accurately apply to all of those confidentiality claims which you have asserted.

CBI

[ ]

"My company has taken measures to protect the confidentiality of the information, and it will continue to take these measures; the information is not, and has not been, reasonably ascertainable by other persons (other than government bodies) by using legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding) without my company's consent; the information is not publicly available elsewhere; and disclosure of the information would cause substantial harm to my company's competitive position." N/A

NAME	SIGNATURE	DATE SIGNED
TITLE	(_____) _____ - _____ TELEPHONE NO.	

[ ] Mark (X) this box if you attach a continuation sheet.

1.11 Parent Company Identification

CBI Name [G][E][N][E][R][A][L][ ][E][L][E][C][T][R][I][C][ ][C][O][M][P][A][N][Y][ ][ ]

[ ] Address [3][1][3][5][ ][E][A][S][T][ ][T][U][R][N][P][I][K][E][ ][ ][ ][ ][ ]
Street

[F][A][I][R][F][I][E][L][D][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]
City

[C][T] [0][6][4][3][1]--[ ][ ][ ][ ]
State Zip

Dun & Bradstreet Number .....[0][0]-[1][3][6]-[7][9][6][0]

1.12 Technical Contact

CBI Name [S][C][O][T][T][ ][L][e][R][E][A][U][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]

[ ] Title [I][N][D][U][S][T][R][I][A][L][ ][H][Y][G][I][E][N][I][S][T][ ][ ][ ][ ][ ][ ]

Address [1][0][0][ ][W][O][O][D][L][A][W][N][ ][A][V][E][N][U][E][ ][ ][ ][ ][ ][ ]
Street

[P][I][T][T][S][F][I][E][L][D][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]
City

[M][A] [0][1][2][0][1]--[ ][ ][ ][ ]
State Zip

Telephone Number .....[4][1][3]-[4][9][4]-[2][3][1][5]

1.13 This reporting year is from ..... [0][1] [8][8] to [1][2] [8][8]
Mo. Year Mo. Year

[ ] Mark (X) this box if you attach a continuation sheet.

1.16 For each classification listed below, state the quantity of the listed substance that was manufactured, imported, or processed at your facility during the reporting year.

CBI

[ ]

Classification	Quantity (kg/yr)
Manufactured	N/A
Imported	N/A
Processed (include quantity repackaged)	.272
Of that quantity manufactured or imported, report that quantity:	
In storage at the beginning of the reporting year	N/A
For on-site use or processing	N/A
For direct commercial distribution (including export)	N/A
In storage at the end of the reporting year	N/A
Of that quantity processed, report that quantity:	
In storage at the beginning of the reporting year	UK
Processed as a reactant (chemical producer)	N/A
Processed as a formulation component (mixture producer)	N/A
Processed as an article component (article producer)	.272
Repackaged (including export)	N/A
In storage at the end of the reporting year	UK

[ ] Mark (X) this box if you attach a continuation sheet.

SECTION 2 MANUFACTURER, IMPORTER, AND PROCESSOR VOLUME AND USE

2.01 State the total number of years, including the reporting year, that your facility has manufactured, imported, or processed the listed substance.

CBI

[ ]

Number of years manufactured ..... N/A yrs.

Number of years imported ..... N/A yrs.

Number of years processed ..... 2 yrs.

2.02 State the quantity of the listed substance that your facility manufactured, imported, or processed during the corporate fiscal year preceding the reporting year.

CBI

[ ]

Year ending ..... [ ][ ] (Mo.) [ ][ ] (Year)

Quantity manufactured ..... UK kg

Quantity imported ..... UK kg

Quantity processed ..... UK kg

2.03 State the quantity of the listed substance that your facility manufactured, imported, or processed during the 2 corporate fiscal years preceding the reporting year in descending order.

CBI

[ ]

Year ending ..... [ ][ ] (Mo.) [ ][ ] (Year)

Quantity manufactured ..... UK kg

Quantity imported ..... UK kg

Quantity processed ..... UK kg

Year ending ..... [ ][ ] (Mo.) [ ][ ] (Year)

Quantity manufactured ..... UK kg

Quantity imported ..... UK kg

Quantity processed ..... UK kg

[ ] Mark (X) this box if you attach a continuation sheet.

2.06 Specify the manner in which you processed the listed substance. Circle all appropriate process types. N/A

CBI

[ ]

Continuous process 1

Semicontinuous process ..... (2)

Batch process 3

2.07 State your facility's name-plate capacity for manufacturing or processing the listed substance. (If you are a batch manufacturer or batch processor, do not answer this question.) N/A

CBI

[ ]

Manufacturing capacity ..... _____ kg/yr

Processing capacity ..... _____ kg/yr

2.08 If you intend to increase or decrease the quantity of the listed substance manufactured, imported, or processed at any time after your current corporate fiscal year, estimate the increase or decrease based upon the reporting year's production volume. N/A

CBI

[ ]

	Manufacturing Quantity (kg)	Importing Quantity (kg)	Processing Quantity (kg)
Amount of increase			
Amount of decrease			

[ ] Mark (X) this box if you attach a continuation sheet.

2.11 Related Product Types -- List any byproducts, coproducts, or impurities present with the listed substance in concentrations greater than 0.1 percent as it is manufactured, imported, or processed. The source of byproducts, coproducts, or impurities means the source from which the byproducts, coproducts, or impurities are made or introduced into the product (e.g., carryover from raw material, reaction product, etc.). N/A

CBI
[ ]

CAS No.	Chemical Name	Byproduct, Coproduct or Impurity[1]	Concentration (%) (specify ± % precision)	Source of Byproducts, Coproducts, or Impurities

[1]Use the following codes to designate byproduct, coproduct, or impurity:

B = Byproduct
C = Coproduct
I = Impurity

[ ] Mark (X) this box if you attach a continuation sheet.

2.13 Expected Product Types -- Identify all product types which you expect to manufacture, import, or process using the listed substance at any time after your current corporate fiscal year. For each use, specify the quantity you expect to manufacture, import, or process for each use as a percentage of the total volume of listed substance used during the reporting year. Also list the quantity of listed substance used captively on-site as a percentage of the value listed under column b., and the types of end-users for each product type. (Refer to the instructions for further explanation and an example.)

CBI

[ ] Have not used trade name substance since this reporting year.

N/A Not Applicable

a. Product Types[1]	b. % of Quantity Manufactured, Imported, or Processed	c. % of Quantity Used Captively On-Site	d. Type of End-Users[2]

[1]Use the following codes to designate product types:

A = Solvent
B = Synthetic reactant
C = Catalyst/Initiator/Accelerator/Sensitizer
D = Inhibitor/Stabilizer/Scavenger/Antioxidant
E = Analytical reagent
F = Chelator/Coagulant/Sequestrant
G = Cleanser/Detergent/Degreaser
H = Lubricant/Friction modifier/Antiwear agent
I = Surfactant/Emulsifier
J = Flame retardant
K = Coating/Binder/Adhesive and additives
L = Moldable/Castable/Rubber and additives
M = Plasticizer
N = Dye/Pigment/Colorant/Ink and additives
O = Photographic/Reprographic chemical and additives
P = Electrodeposition/Plating chemicals
Q = Fuel and fuel additives
R = Explosive chemicals and additives
S = Fragrance/Flavor chemicals
T = Pollution control chemicals
U = Functional fluids and additives
V = Metal alloy and additives
W = Rheological modifier
X = Other (specify) _____

[2]Use the following codes to designate the type of end-users:

I = Industrial
CM = Commercial
CS = Consumer
H = Other (specify) _____

[ ] Mark (X) this box if you attach a continuation sheet.

2.15 Circle all applicable modes of transportation used to deliver bulk shipments of the CBI listed substance to off-site customers. N/A

[ ] Truck 1

Railcar 2

Barge, Vessel 3

Pipeline 4

Plane 5

Other (specify) _____ 6

2.16 Customer Use -- Estimate the quantity of the listed substance used by your customers or prepared by your customers during the reporting year for use under each category CBI of end use listed (i-iv). NOT AVAILABLE

[ ]

Category of End Use

i. Industrial Products

Chemical or mixture ..... _____ kg/yr

Article ..... _____ kg/yr

ii. Commercial Products

Chemical or mixture ..... _____ kg/yr

Article ..... _____ kg/yr

iii. Consumer Products

Chemical or mixture ..... _____ kg/yr

Article ..... _____ kg/yr

iv. Other

Distribution (excluding export) ..... _____ kg/yr

Export ..... _____ kg/yr

Quantity of substance consumed as reactant ..... _____ kg/yr

Unknown customer uses ..... _____ kg/yr

[ ] Mark (X) this box if you attach a continuation sheet.

SECTION 3 PROCESSOR RAW MATERIAL IDENTIFICATION

PART A GENERAL DATA

3.01 Specify the quantity purchased and the average price paid for the listed substance for each major source of supply listed. Product trades are treated as purchases.
CBI The average price is the market value of the product that was traded for the listed substance.
[ ]

Source of Supply	Quantity (kg)	Average Price ($/kg)
The listed substance was manufactured on-site.	N/A	N/A
The listed substance was transferred from a different company site.	N/A	N/A
The listed substance was purchased directly from a manufacturer or importer.	N/A	N/A
The listed substance was purchased from a distributor or repackager.	UK	UK
The listed substance was purchased from a mixture producer.	N/A	N/A

3.02 Circle all applicable modes of transportation used to deliver the listed substance to
CBI your facility.

[ ]

Truck ..... (1)
Railcar 2
Barge, Vessel 3
Pipeline 4
Plane 5
Other (specify) _____ 6

[ ] Mark (X) this box if you attach a continuation sheet.

PART B RAW MATERIAL IN THE FORM OF A MIXTURE

3.04 If you obtain the listed substance in the form of a mixture, list the trade name(s) of the mixture, the name of its supplier(s) or manufacturer(s), an estimate of the
CBI average percent composition by weight of the listed substance in the mixture, and the amount of mixture processed during the reporting year.
[ ]

Trade Name	Supplier or Manufacturer	Average % Composition by Weight (specify ± % precision)	Amount Processed (kg/yr)
EN 9 OZR PART A	CONAP	< 15%	.272

1988 - 4 lbs. used

1 Kilogram = 2.2046 lbs.

1.814 Kilograms = 4 lbs

15% of mixture is Reportable

15% of 1.814 Kilograms =

1.814
× .15
.272 Kilograms reportable/yr.

[ ] Mark (X) this box if you attach a continuation sheet.

SECTION 4 PHYSICAL/CHEMICAL PROPERTIES

General Instructions:

If you are reporting on a mixture as defined in the glossary, reply to questions in Section 4 that are inappropriate to mixtures by stating "NA -- mixture."

For questions 4.06-4.15, if you possess any hazard warning statement, label, MSDS, or other notice that addresses the information requested, you may submit a copy or reasonable facsimile in lieu of answering those questions which it addresses.

PART A PHYSICAL/CHEMICAL DATA SUMMARY

4.01 Specify the percent purity for the three major[1] technical grade(s) of the listed substance as it is manufactured, imported, or processed. Measure the purity of the substance in the final product form for manufacturing activities, at the time you import the substance, or at the point you begin to process the substance. N/A

CBI

[ ]

	Manufacture	Import	Process
Technical grade #1	_____% purity	_____% purity	_____% purity
Technical grade #2	_____% purity	_____% purity	_____% purity
Technical grade #3	_____% purity	_____% purity	_____% purity

[1]Major = Greatest quantity of listed substance manufactured, imported or processed.

4.02 Submit your most recently updated Material Safety Data Sheet (MSDS) for the listed substance, and for every formulation containing the listed substance. If you possess an MSDS that you developed and an MSDS developed by a different source, submit your version. Indicate whether at least one MSDS has been submitted by circling the appropriate response.

Yes ..... ATTACHED APPENDIX 1 ..... (1)

No 2

Indicate whether the MSDS was developed by your company or by a different source.

Your company 1

Another source ..... (2)

[X] Mark (X) this box if you attach a continuation sheet.

4.05 Particle Size -- If the listed substance exists in particulate form during any of the following activities, indicate for each applicable physical state the size and the percentage distribution of the listed substance by activity. Do not include particles ≥10 microns in diameter. Measure the physical state and particle sizes for importing and processing activities at the time you import or begin to process the listed substance. Measure the physical state and particle sizes for manufacturing storage, disposal and transport activities using the final state of the product.

CBI

[ ] N/A Not Available

Physical State		Manufacture	Import	Process	Store	Dispose	Transport
Dust	<1 micron						
	1 to <5 microns						
	5 to <10 microns						
Powder	<1 micron						
	1 to <5 microns						
	5 to <10 microns						
Fiber	<1 micron						
	1 to <5 microns						
	5 to <10 microns						
Aerosol	<1 micron						
	1 to <5 microns						
	5 to <10 microns						

[ ] Mark (X) this box if you attach a continuation sheet.

4.08 Indicate the flammable limits in air (% by volume) for the listed substance at standard temperature and pressure.

Lower limit ..... _____%

Upper limit ..... _____%

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes ..... (1)

No 2

[ ] Mark (X) this box if you attach a continuation sheet.

4.10 Special Firefighting Procedures -- Identify (Y/N/NA/UK) all known restrictions on firefighting procedures used to combat fires caused by each product type which contains the listed substance. (Refer to the instructions for definitions of Y, N, NA and UK.)

	Product Types Containing the Listed Substance[1]					
Special Firefighting Procedures	1	2	3	4	5	6
Do not use water						
Do not increase air pressure						
Other (specify) _____						

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes ..... (1)

No 2

---

[1]Identify the product types listed under each column (1-6) in the following table:

Product Type No.	Product Type Identity
1	
2	
3	
4	
5	
6	

[ ] Mark (X) this box if you attach a continuation sheet.

4.13 Indicate the autoignition temperature for the listed substance and the test method used to derive this value.

Autoignition temperature ..... _____ °C

Test method ..... _____

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes ..... (1)

No 2

4.14 Vapor in Cargo Tanks -- If storing the listed substance in a cargo tank causes vapor problems, such as peroxide formation, reaction with moisture, etc., specify the problem and necessary controls or restrictions used to remedy each problem.

Vapor Problem	Controls/Restrictions
Peroxide formation	_____
Reaction with moisture	_____
Combustion	_____
Other (specify)	
_____	_____
_____	_____

Indicate if hazard information/MSDS has been submitted in lieu of response by circling the appropriate response.

Yes ..... (1)

No 2

[ ] Mark (X) this box if you attach a continuation sheet.

SECTION 5 ENVIRONMENTAL FATE

PART A RATE CONSTANTS AND TRANSFORMATION PRODUCTS

5.01 Indicate the rate constants for the following transformation processes.

a. Photolysis: NOT Available

Absorption spectrum coefficient (peak) .... _____ (1/M cm) at _____ nm

Reaction quantum yield, ϕ ..... _____ at _____ nm

Direct photolysis rate constant, k_p, at ... _____ 1/hr _____ latitude

b. Oxidation constants at 25°C:

For $^1O_2$ (singlet oxygen), k_{ox} ..... _____ 1/M hr

For RO_2 (peroxy radical), k_{ox} ..... _____ 1/M hr

c. Five-day biochemical oxygen demand, BOD_5 ... _____ mg/l

d. Biotransformation rate constant:

For bacterial transformation in water, k_b... _____ 1/hr

Specify culture ..... _____

e. Hydrolysis rate constants:

For base-promoted process, k_B ..... _____ 1/M hr

For acid-promoted process, k_A ..... _____ 1/M hr

For neutral process, k_N ..... _____ 1/hr

f. Chemical reduction rate (specify conditions) _____

_____

g. Other (such as spontaneous degradation) ... _____

_____

[ ] Mark (X) this box if you attach a continuation sheet.

5.07 List the bioconcentration factor (BCF) of the listed substance, the species for which it was determined, and the type of test used in deriving the BCF.

N/A Not Available

Bioconcentration Factor	Species	Test[1]

[1]Use the following codes to designate the type of test:

F = Flowthrough
S = Static

[ ] Mark (X) this box if you attach a continuation sheet.

6.04 For each market listed below, state the quantity sold and the total sales value of
CBI the listed substance sold or transferred in bulk during the reporting year.

[ ]

Market	Quantity Sold or Transferred (kg/yr)	Total Sales Value ($/yr)
Retail sales		
Distribution -- Wholesalers		
Distribution -- Retailers		
Intra-company transfer		
Repackagers		
Mixture producers		
Article producers		
Other chemical manufacturers or processors		
Exporters		
Other (specify)		
_____		

6.05 Substitutes -- List all known commercially feasible substitutes that you know exist for the listed substance and state the cost of each substitute. A commercially feasible substitute is one which is economically and technologically feasible to use
CBI in your current operation, and which results in a final product with comparable performance in its end uses.

[ ]

Substitute	Cost ($/kg)
N/A - We are end users of CONAP Products	

[ ] Mark (X) this box if you attach a continuation sheet.

6.09 State your company's total sales and sales of the listed substance sold in bulk for
CBI the corporate fiscal year preceding the reporting year. (Refer to the instructions for question 6.08 for the methodology used to answer this question.)

[__]

UK

Year ending ..... [__][__] (Mo.) [__][__] (Year)

Company's total sales ($) ..... _____

Sales of listed substance ($) ..... _____

6.10 State your company's total sales and sales of the listed substance sold in bulk for the 2 corporate fiscal years preceding the reporting year in descending order.
CBI (Refer to the instructions for question 6.08 for the methodology used to answer this question.)

[__]

UK

Year ending ..... [__][__] (Mo.) [__][__] (Year)

Company's total sales ($) ..... _____

Sales of listed substance ($) ..... _____

Year ending ..... [__][__] (Mo.) [__][__] (Year)

Company's total sales ($) ..... _____

Sales of listed substance ($) ..... _____

[__] Mark (X) this box if you attach a continuation sheet.

7.02 In accordance with the instructions, provide a separate process block flow diagram showing each of the three major (greatest volume) process types involving the listed substance.

CBI

[ ] Process type ..... _____

Use CONAP adhesive to band electrical components to Printed Circuit Boards. Printed Circuit Boards are then placed in subsystems. Subsystems placed in over all defense article. Article then delivered to Department of Defense customer.

[ ] Mark (X) this box if you attach a continuation sheet.

7.04 Describe the typical equipment types for each unit operation identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

N/A

[ ] Process type ..... _____

Unit Operation ID Number	Typical Equipment Type	Operating Temperature Range (°C)	Operating Pressure Range (mm Hg)	Vessel Composition

[ ] Mark (X) this box if you attach a continuation sheet.

7.06 Characterize each process stream identified in your process block flow diagram(s). If a process block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type. (Refer to the CBI instructions for further explanation and an example.)

[ ] Process type ..... N/A

a. Process Stream ID Code	b. Known Compounds[1]	c. Concentrations[2,3] (% or ppm)	d. Other Expected Compounds	e. Estimated Concentrations (% or ppm)

7.06 continued below

[ ] Mark (X) this box if you attach a continuation sheet.

SECTION 8 RESIDUAL TREATMENT GENERATION, CHARACTERIZATION, TRANSPORTATION, AND MANAGEMENT

General Instructions:

For questions 8.04-8.06, provide a separate response for each residual treatment block flow diagram provided in question 8.01, 8.02 or 8.03. Identify the process type from which the information is extracted.

For questions 8.05-8.33, the Stream Identification Codes are those process streams listed in either the Section 7 or Section 8 block flow diagrams which contain residuals for each applicable waste management method.

For questions 8.07-8.33, if residuals are combined before they are handled, list those Stream Identification Codes on the same line.

Questions 8.09-8.33 refer to the waste management activities involving the residuals identified in either the Section 7 or Section 8 block flow diagrams. Not all Stream Identification Codes used in the sample answers (e.g., for the incinerator questions) have corresponding process streams identified in the block flow diagram(s). These Stream Identification codes are for illustrative purposes only.

For questions 8.11-8.33, if you have provided the information requested on one of the EPA Office of Solid Waste surveys listed below within the three years prior to your reporting year, you may submit a copy or reasonable facsimile in lieu of answering those questions which the survey addresses. The applicable surveys are: (1) Hazardous Waste Treatment, Storage, Disposal, and Recycling Survey; (2) Hazardous Waste Generator Survey; or (3) Subtitle D Industrial Facility Mail Survey.

[ ] Mark (X) this box if you attach a continuation sheet.

8.02 In accordance with the instructions, provide residual treatment block flow diagram(s) which describe each of the treatment processes used for residuals identified in question 7.02.

CBI

[ ] Process type ..... N/A not applicable

[ ] Mark (X) this box if you attach a continuation sheet.

8.04 Describe the typical equipment types for each unit operation identified in your residual treatment block flow diagram(s). If a residual treatment block flow diagram is provided for more than one process type, photocopy this question and complete it separately for each process type.

CBI

[ ] Process type ..... N/A Not applicable

Unit Operation ID Number (as assigned in questions 8.01, 8.02, or 8.03)	Typical Equipment Type

[ ] Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

[1]Use the following codes to designate the type of hazardous waste:

I = Ignitable
C = Corrosive
R = Reactive
E = EP toxic
T = Toxic
H = Acutely hazardous

[2]Use the following codes to designate the physical state of the residual:

GC = Gas (condensible at ambient temperature and pressure)
GU = Gas (uncondensible at ambient temperature and pressure)
SO = Solid
SY = Sludge or slurry
AL = Aqueous liquid
OL = Organic liquid
IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

8.05 continued below

[ ] Mark (X) this box if you attach a continuation sheet.

8.05 (continued)

[5]Use the following codes to designate how the concentration was measured:

V = Volume
W = Weight

[6]Specify the analytical test methods used and their detection limits in the table below. Assign a code to each test method used and list those codes in column e.

N/A

Code	Method	Detection Limit (± ug/l)
1		
2		
3		
4		
5		
6		

[ ] Mark (X) this box if you attach a continuation sheet.

EXHIBIT 8-1.
(Refers to question 8.06(b))

WASTE DESCRIPTION CODES

These waste description codes were developed specifically for this survey to supplement the descriptions listed with the RCRA and other waste codes. (These waste description codes are not regulatory definitions.)

WASTE DESCRIPTION CODES FOR HAZARDOUS WASTE DESCRIBED BY A SINGLE RCRA F, K, P, OR U WASTE CODE

A01 Spent solvent (F001-F005, K086)
A02 Other organic liquid (F001-F005, K086)
A03 Still bottom (F001-F005, K086)
A04 Other organic sludge (F001-F005, K086)
A05 Wastewater or aqueous mixture
A06 Contaminated soil or cleanup residue
A07 Other F or K waste, exactly as described*
A08 Concentrated off-spec or discarded product
A09 Empty containers
A10 Incinerator ash
A11 Solidified treatment residue
A12 Other treatment residue (specify in "Facility Notes")
A13 Other untreated waste (specify in "Facility Notes")

*"Exactly as described" means that the waste matches the description of the RCRA waste code.

INORGANIC LIQUIDS—Waste that is primarily inorganic and highly fluid (e.g., aqueous), with low suspended inorganic solids and low organic content.

B01 Aqueous waste with low solvents
B02 Aqueous waste with low other toxic organics
B03 Spent acid with metals
B04 Spent acid without metals
B05 Acidic aqueous waste
B06 Caustic solution with metals but no cyanides
B07 Caustic solution with metals and cyanides
B08 Caustic solution with cyanides but no metals
B09 Spent caustic
B10 Caustic aqueous waste
B11 Aqueous waste with reactive sulfides
B12 Aqueous waste with other reactives (e.g., explosives)
B13 Other aqueous waste with high dissolved solids
B14 Other aqueous waste with low dissolved solids
B15 Scrubber water
B16 Leachate
B17 Waste liquid mercury
B18 Other inorganic liquid (specify in "Facility Notes")

INORGANIC SLUDGES—Waste that is primarily inorganic, with moderate-to-high water content and low organic content; pumpable.

B19 Lime sludge without metals
B20 Lime sludge with metals/metal hydroxide sludge
B21 Wastewater treatment sludge with toxic organics
B22 Other wastewater treatment sludge
B23 Untreated plating sludge without cyanides
B24 Untreated plating sludge with cyanides
B25 Other sludge with cyanides
B26 Sludge with reactive sulfides
B27 Sludge with other reactives
B28 Degreasing sludge with metal scale or filings
B29 Air pollution control device sludge (e.g., fly ash, wet scrubber sludge)
B30 Sediment or lagoon dragout contaminated with organics
B31 Sediment or lagoon dragout contaminated with inorganics only
B32 Drilling mud
B33 Asbestos slurry or sludge
B34 Chloride or other brine sludge
B35 Other inorganic sludge (specify in "Facility Notes")

INORGANIC SOLIDS—Waste that is primarily inorganic and solid, with low organic content and low-to-moderate water content; not pumpable.

B36 Soil contaminated with organics
B37 Soil contaminated with inorganics only
B38 Ash, slag, or other residue from incineration of wastes
B39 Other "dry" ash, slag, or thermal residue
B40 "Dry" lime or metal hydroxide solids chemically "fixed"
B41 "Dry" lime or metal hydroxide solids not "fixed"
B42 Metal scale, filings, or scrap
B43 Empty or crushed metal drums or containers
B44 Batteries or battery parts, casings, cores
B45 Spent solid filters or adsorbents
B46 Asbestos solids and debris
B47 Metal-cyanide salts/chemicals
B48 Reactive cyanide salts/chemicals
B49 Reactive sulfide salts/chemicals
B50 Other reactive salts/chemicals
B51 Other metal salts/chemicals
B52 Other waste inorganic chemicals
B53 Lab packs of old chemicals only
B54 Lab packs of debris only
B55 Mixed lab packs
B56 Other inorganic solids (specify in "Facility Notes")

INORGANIC GASES—Waste that is primarily inorganic with a low organic content and is a gas at atmospheric pressure.

B57 Inorganic gases

ORGANIC LIQUIDS—Waste that is primarily organic and is highly fluid, with low inorganic solids content and low-to-moderate water content.

B58 Concentrated solvent-water solution
B59 Halogenated (e.g., chlorinated) solvent
B60 Nonhalogenated solvent
B61 Halogenated/nonhalogenated solvent mixture
B62 Oil-water emulsion or mixture
B63 Waste oil
B64 Concentrated aqueous solution of other organics
B65 Concentrated phenolics
B66 Organic paint, ink, lacquer, or varnish
B67 Adhesives or expoxies
B68 Paint thinner or petroleum distillates
B69 Reactive or polymerizable organic liquid
B70 Other organic liquid (specify in "Facility Notes")

ORGANIC SLUDGES—Waste that is primarily organic, with low-to-moderate inorganic solids content and water content; pumpable.

B71 Still bottoms of halogenated (e.g., chlorinated) solvents or other organic liquids
B72 Still bottoms of nonhalogenated solvents or other organic liquids
B73 Oily sludge
B74 Organic paint or ink sludge
B75 Reactive or polymerizable organics
B76 Resins, tars, or tarry sludge
B77 Biological treatment sludge
B78 Sewage or other untreated biological sludge
B79 Other organic sludge (specify in "Facility Notes")

ORGANIC SOLIDS—Waste that is primarily organic and solid, with low-to-moderate inorganic content and water content; not pumpable.

B80 Halogenated pesticide solid
B81 Nonhalogenated pesticide solid
B82 Solid resins or polymerized organics
B83 Spent carbon
B84 Reactive organic solid
B85 Empty fiber or plastic containers
B86 Lab packs of old chemicals only
B87 Lab packs of debris only
B88 Mixed lab packs
B89 Other halogenated organic solid
B90 Other nonhalogenated organic solid

ORGANIC GASES—Waste that is primarily organic with low-to-moderate inorganic content and is a gas at atmospheric pressure.

B91 Organic gases

EXHIBIT 8-2. (continued)

MANAGEMENT METHODS

17WT Ferrous sulfate
18WT Other chromium reduction

Complexed metals treatment (other than chemical precipitation by pH adjustment)
19WT Complexed metals treatment

Emulsion breaking
20WT Thermal
21WT Chemical
22WT Other emulsion breaking

Adsorption
23WT Carbon adsorption
24WT Ion exchange
25WT Resin adsorption
26WT Other adsorption

Stripping
27WT Air stripping
28WT Steam stripping
29WT Other stripping

Evaporation
30WT Thermal
31WT Solar
32WT Vapor recompression
33WT Other evaporation

Filtration
34WT Diatomaceous earth
35WT Sand
36WT Multimedia
37WT Other filtration

Sludge dewatering
38WT Gravity thickening
39WT Vacuum filtration
40WT Pressure filtration (belt, plate and frame, or leaf)
41WT Centrifuge
42WT Other sludge dewatering

Air flotation
43WT Dissolved air flotation
44WT Partial aeration
45WT Air dispersion
46WT Other air flotation

Oil skimming
47WT Gravity separation
48WT Coalescing plate separation
49WT Other oil skimming

Other liquid phase separation
50WT Decanting
51WT Other liquid phase separation

Biological treatment
52WT Activated sludge
53WT Fixed film-trickling filter
54WT Fixed film-rotating contactor
55WT Lagoon or basin, aerated
56WT Lagoon, facultative
57WT Anaerobic
58WT Other biological treatment

Other wastewater treatment
59WT Wet air oxidation
60WT Neutralization
61WT Nitrification
62WT Denitrification
63WT Flocculation and/or coagulation
64WT Settling (clarification)
65WT Reverse osmosis
66WT Other wastewater treatment

OTHER WASTE TREATMENT

1TR Other treatment
2TR Other recovery for reuse

ACCUMULATION

1A Containers
2A Tanks

STORAGE

1ST Container (i.e., barrel, drum)
2ST Tank
3ST Waste pile
4ST Surface impoundment
5ST Other storage

DISPOSAL

1D Landfill
2D Land treatment
3D Surface impoundment (to be closed as a landfill)
4D Underground injection well

---

[1]Chemical precipitation is a treatment operation whereby the pH of a waste is adjusted to the range necessary for removal (precipitation) of contaminants. However, if the pH is adjusted solely to achieve a neutral pH, THE OPERATION SHOULD BE CONSIDERED NEUTRALIZATION (60WT).

8.09 Identify each off-site facility (including POTWs) that manages the residuals identified in your process block or residual treatment block flow diagram(s), and the quantity that each managed during the reporting year. Photocopy this question and complete it separately for each off-site facility. N/A

CBI

[ ]

Stream ID Code	Annual Quantity (kg)

Facility Name [ ]

Address [ ]
Street

[ ]
City

[ ][ ] [ ][ ][ ][ ][ ]--[ ][ ][ ][ ]
State Zip Code

EPA Identification Number (i.e.,
Hazardous Waste Facility ID Number) ..... [ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ][ ]

[ ] Mark (X) this box if you attach a continuation sheet.

8.11 On-Site Storage or Treatment in Piles -- Complete this table for the five largest (by volume) piles that are used on-site to store or treat the residuals identified in your process block or residual treatment block flow diagram(s).

CBI

[ ] N/A

Pile	Quantity Managed per Year (cubic meters)	Under Roofed Structure (Y/N)	Type of Containment Provided[1]	Synthetic Liner Base (Y/N)[2]	Frequency of Transfer and/or Handling Operations[3]	Stream ID Code
1						
2						
3						
4						
5						

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

---

[1]Use the following codes to designate the type of containment provided:

C = Complete (includes both dike containment and underground (leachate) containment)
P1 = Partial-1 (includes just dike containment)
P2 = Partial-2 (includes just underground (leachate) containment)
N = None

[2]Waste may lie directly on the synthetic liner or the liner may be covered with a clay layer

[3]Use the following codes to designate frequency of transfer and/or handling operations:

A = Daily
B = Weekly
C = Monthly
D = Other (specify) _____

[ ] Mark (X) this box if you attach a continuation sheet.

8.13 On-Site Storage, Treatment, or Disposal in Containers -- Complete the following table for the five largest (by volume) types of free standing containers that are used on-site to store, treat, or dispose of the residuals identified in your process block or residual treatment block flow diagram(s).

CBI

[ ] N/A

Container	Design Capacity (liters)	Quantity Stored per Year (liters)	Treatment Types[1]	Average Length of Storage (days)	Average Daily Stored Quantity (liters)	Maximum Operational Storage Capacity (liters)	Storage Base Material[2]	Stream ID Code
1								
2								
3								
4								
5								

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

---

[1]Indicate "S" for storage and use the codes provided in Exhibit 8-3 to designate treatment types

If residual is stored, indicate (Y/N) in parenthesis whether the storage area is designed and operated to collect and contain surface runoff

[2]Use the following codes to designate storage base materials:

A = Concrete
B = Asphalt
C = Soil
D = Other (specify) _____

[ ] Mark (X) this box if you attach a continuation sheet.

8.14 On-Site Burning in Boilers -- Complete the following table for the five largest (by capacity) boilers that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

CBI

[ ] N/A

Boiler	Boiler Type[1]	Average Boiler Load[2] (%)	Average Fuel Replacement Ratio[3] (%)	Stream ID Code
1				
2				
3				
4				
5				

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

---

[1]Use the following codes to designate boiler type:

F = Fire tube
W = Water tube

[2]Designate the average boiler load when firing residual (percent of capacity)

[3]Designate the average fuel replacement ratio as a percentage (heat-input basis)

[ ] Mark (X) this box if you attach a continuation sheet.

8.16 Provide the following information for the residuals identified in your process block or residual treatment block flow diagram(s) that are burned in on-site boilers. Photocopy this question and complete it separately for each boiler.

CBI

N/A

[ ] Boiler number ..... _____

Stream ID code(s) ..... _____

	Residual, as Fired (or residual mixture if residuals are blended)	Boiler Fuel, as Fired (residual(s) plus primary fuel)
Btu content (J/kg)		
Average	_____	_____
Minimum	_____	_____
Total halogen content (% by wt.)		
Average	_____	_____
Maximum	_____	_____

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

[ ] Mark (X) this box if you attach a continuation sheet.

8.18 Complete the following table for the five largest (by capacity) boilers that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

CBI

[ ] N/A

Boiler	Air Pollution Control Device[1]	Types of Emissions Data Available
1		
2		
3		
4		
5		

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

---

[1]Use the following codes to designate the air pollution control device:

S = Scrubber (include type of scrubber in parenthesis)
E = Electrostatic precipitator
O = Other (specify) _____

[ ] Mark (X) this box if you attach a continuation sheet.

8.20 On-Site Burning in Incinerators -- Complete the following table for the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

CBI

[ ] N/A

Incinerator	Incinerator Type[1]	Primary Incinerator Fuel[2]	Average Fuel Replacement Ratio[3]	Stream ID Code
1				
2				
3				

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

---

[1]Use the following codes to designate the incinerator type:

1I = Liquid injection
2I = Rotary or rocking kiln
3I = Rotary kiln with a liquid injection unit
4I = Two stage
5I = Fixed hearth
6I = Multiple hearth
7I = Fluidized bed
8I = Infrared
9I = Fume/vapor
10I = Pyrolytic destructor
11I = Other (specify) _____

[2]Use the following codes to designate the primary incinerator fuel:

A = Oil
B = Gas
C = Coal
D = Wood
E = Other (specify) _____

[3]Designate the percentage of auxiliary fuel used when firing residual (percent of capacity)

[ ] Mark (X) this box if you attach a continuation sheet.

8.22 Describe the combustion chamber design parameters for each of the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

CBI

[ ] N/A

Incinerator	Combustion Chamber Temperature (°C)		Location of Temperature Monitor		Residence Time In Combustion Chamber (seconds)	
	Primary	Secondary	Primary	Secondary	Primary	Secondary
1						
2						
3						

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

8.23 Complete the following table for the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s).

CBI

[ ] N/A

Incinerator	Air Pollution Control Device[1]	Types of Emissions Data Available
1		
2		
3		

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

---

[1] Use the following codes to designate the air pollution control device:

S = Scrubber (include type of scrubber in parenthesis)
E = Electrostatic precipitator
O = Other (specify) _____

[ ] Mark (X) this box if you attach a continuation sheet.

8.25 Provide the following information on the incinerator feed for the three largest (by capacity) incinerators that are used on-site to burn the residuals identified in your process block or residual treatment block flow diagram(s). Photocopy this question and complete it separately for each incinerator.

CBI

N/A

[ ] Incinerator number ..... _____

Stream ID code(s) ..... _____

	Residual, as Fired (or residual mixture if residuals are blended)	Incinerator Fuel, as Fired (residual(s) plus primary fuel)
Btu content (J/kg)		
Average	_____	_____
Minimum	_____	_____
Feed rate (kg/hr)	_____	_____
Feed rate (J/hr)(kg/hr x J/kg)	_____	_____
Total halogen content (% by weight)		
Average	_____	_____
Maximum	_____	_____
Total ash content (% by weight)		
Average	_____	_____
Maximum	_____	_____
Total water content (% by weight)		
Average	_____	_____
Maximum	_____	_____

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

[ ] Mark (X) this box if you attach a continuation sheet.

8.27 On-Site Storage, Treatment or Disposal in a Land Treatment Site -- Complete the following table for each on-site land treatment site that is used to store, treat, or dispose of the residuals identified in your process block or residual treatment block flow diagram(s).

CBI

N/A

[__] Total area actively used for land treatment ..... _____ m^2

Average slope of site (degree incline) ..... _____

Surface water runoff management[1] ..... _____

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

---

[1]Use the following codes to describe the management practices for surface water runoff:

A = Collection prior to treatment
B = Reapplication to the site
C = Canalization prior to treatment
D = Other (specify) _____

[__] Mark (X) this box if you attach a continuation sheet.

8.29 On-Site Storage, Treatment, or Disposal in Surface Impoundments -- Complete the following table for the five largest (by volume) surface impoundments that are used on-site to treat, store, or dispose of the residuals identified in your process block or residual treatment block flow diagram(s).

CBI

[ ] N/A

Impoundment	Total Capacity (liters)	Specify Storage, Disposal or Treatment Type if Applicable[1]	Average Residency Time (days)[2]	SYNTHETIC LINER		CLAY LINER		LEACHATE COLLECTION SYSTEM		Stream ID Code
				No. of Liners	Thickness (cm)[3]	No. of Liners	Thickness (cm)[3]	Installed (Y/N)	Leachate Collected (Y/N)	
1										
2										
3										
4										
5										

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

---

[1]Indicate "S" for storage, "D" for disposal, or use the codes provided in Exhibit 8-3 (which follows question 8.13) to designate treatment type

[2]Indicate the residency time for the surface impoundment's flow through stream. In addition, indicate in parenthesis using the following codes the frequency with which the impoundment is dredged to clear the residue that collects on the bottom:

A = Daily
B = Weekly
C = Monthly
D = Other (specify) _____

[3]Indicate the thickness of each liner

[ ] Mark (X) this box if you attach a continuation sheet.

8.31 State the total area actively used on-site for your landfill.

CBI

N/A

[__] Total area actively used ..... _____ m^2

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

8.32 Complete the following table for the five largest landfill cells (by volume) that contain residuals identified in your process block or residual treatment block flow diagram(s).

CBI

[__] N/A

Landfill Cell	WORKING COVER		CAP DESIGN CLAY LAYER		LEACHATE COLLECTION SYSTEM	
	Average Use[1]	Thickness (cm)	Installed (Y/N)	Thickness (cm)	Installed (Y/N)	Leachate Collected (Y/N)
1						
2						
3						
4						
5						

Indicate if Office of Solid Waste survey has been submitted in lieu of response by circling the appropriate response.

Yes 1

No 2

[1]Use the following codes to designate the average use rate:

A = Daily
B = Weekly
C = Monthly
D = Other (specify) _____

[__] Mark (X) this box if you attach a continuation sheet.

SECTION 9 WORKER EXPOSURE

General Instructions:

Questions 9.03-9.25 apply only to those processes and workers involved in manufacturing or processing the listed substance. Do not include workers involved in residual waste treatment unless they are involved in this treatment process on a regular basis (i.e., exclude maintenance workers, construction workers, etc.).

[ ] Mark (X) this box if you attach a continuation sheet.

9.02 In accordance with the instructions, complete the following table for each activity in which you engage.

CBI

[ ] N/A

a. Activity	b. Process Category	c. Yearly Quantity (kg)	d. Total Workers	e. Total Worker-Hours
Manufacture of the listed substance	Enclosed			
	Controlled Release			
	Open			
On-site use as reactant	Enclosed			
	Controlled Release			
	Open			
On-site use as nonreactant	Enclosed			
	Controlled Release			
	Open			
On-site preparation of products	Enclosed			
	Controlled Release			
	Open			

[ ] Mark (X) this box if you attach a continuation sheet.

9.04 In accordance with the instructions, provide your process block flow diagram(s) and indicate associated work areas.

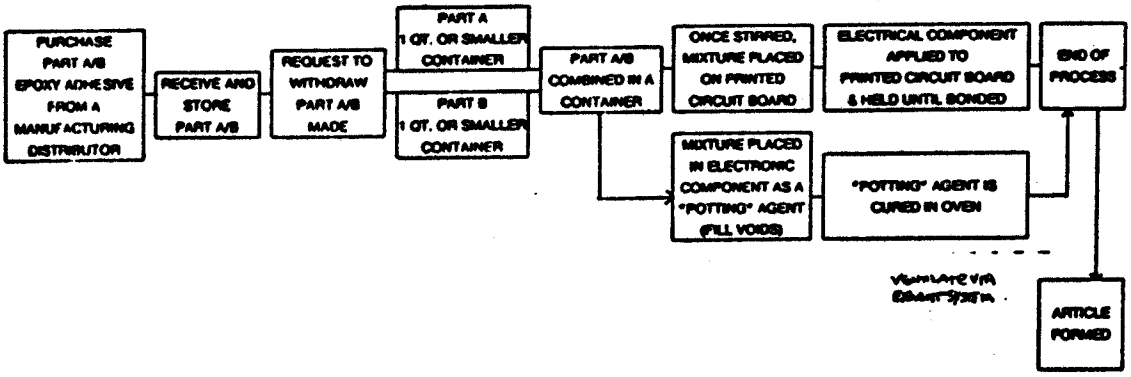
N/A

CBI

[ ] Process type .....

POTTING & ADHESIVE APPLICATION

1. PURCHASE PART A/PART B EPOXY ADHESIVE FROM A MANUFACTURER OR DISTRIBUTOR
2. USE PART A/B, AS INTENDED, TO SECURE ELECTRICAL COMPONENTS TO THE PRINTED CIRCUIT BOARD
3. DO NOT ADD ANY OTHER CHEMICALS TO THE PART A/B
4. MIX A/B IN CONTAINER AND APPLY TO PRINTED CIRCUIT BOARD
5. PLACE ELECTRICAL COMPONENT ON PRINTED CIRCUIT BOARD AND HOLD MOMENTARILY UNTIL BONDING TAKES PLACE
6. REPEAT AS NECESSARY



[ ] Mark (X) this box if you attach a continuation sheet.

9.06 Complete the following table for each work area identified in question 9.05, and for each labor category at your facility that encompasses workers who may potentially come in contact with or be exposed to the listed substance. Photocopy this question and complete it separately for each process type and work area.

CBI

[ ] Process type ..... N/A

Work area .....

Labor Category	Number of Workers Exposed	Mode of Exposure (e.g., direct skin contact)	Physical State of Listed Substance[1]	Average Length of Exposure Per Day[2]	Number of Days per Year Exposed

[1]Use the following codes to designate the physical state of the listed substance at the point of exposure:

GC = Gas (condensible at ambient temperature and pressure)
GU = Gas (uncondensible at ambient temperature and pressure; includes fumes, vapors, etc.)
SO = Solid
SY = Sludge or slurry
AL = Aqueous liquid
OL = Organic liquid
IL = Immiscible liquid (specify phases, e.g., 90% water, 10% toluene)

[2]Use the following codes to designate average length of exposure per day:

A = 15 minutes or less
B = Greater than 15 minutes, but not exceeding 1 hour
C = Greater than one hour, but not exceeding 2 hours
D = Greater than 2 hours, but not exceeding 4 hours
E = Greater than 4 hours, but not exceeding 8 hours
F = Greater than 8 hours

[ ] Mark (X) this box if you attach a continuation sheet.

PART B WORK PLACE MONITORING PROGRAM

9.08 If you monitor worker exposure to the listed substance, complete the following table.

CBI

[ ]

N/A

Sample/Test	Work Area ID	Testing Frequency (per year)	Number of Samples (per test)	Who Samples[1]	Analyzed In-House (Y/N)	Number of Years Records Maintained
Personal breathing zone						
General work area (air)						
Wipe samples						
Adhesive patches						
Blood samples						
Urine samples						
Respiratory samples						
Allergy tests						
Other (specify) _____						
Other (specify) _____						
Other (specify) _____						

[1]Use the following codes to designate who takes the monitoring samples:

A = Plant industrial hygienist
B = Insurance carrier
C = OSHA consultant
D = Other (specify) _____

[ ] Mark (X) this box if you attach a continuation sheet.

9.11 If you conduct routine medical tests for monitoring the health effects of exposure to the listed substance, specify the type and frequency of the tests.

CBI

N/A

[ ]	Test Description	Frequency (weekly, monthly, yearly, etc.)

[ ] Mark (X) this box if you attach a continuation sheet.

9.13 **Describe all equipment or process modifications you have made within the 3 years prior to the reporting year that have resulted in a reduction of worker exposure to the listed substance. For each equipment or process modification described, state the percentage reduction in exposure that resulted. Photocopy this question and complete it separately for each process type and work area.**

CBI

N/A

[ ] **Process type** ..... _____

Work area ..... _____

Equipment or Process Modification	Reduction in Worker Exposure Per Year (%)

[ ] **Mark (X) this box if you attach a continuation sheet.**

9.15 If workers use respirators when working with the listed substance, specify for each process type, the work areas where the respirators are used, the type of respirators used, the average usage, whether or not the respirators were fit tested, and the type and frequency of the fit tests. Photocopy this question and complete it separately for each process type.

CBI

N/A

[__] Process type ..... _____

Work Area	Respirator Type	Average Usage[1]	Fit Tested (Y/N)	Type of Fit Test[2]	Frequency of Fit Tests (per year)

[1]Use the following codes to designate average usage:

A = Daily
B = Weekly
C = Monthly
D = Once a year
E = Other (specify) _____

[2]Use the following codes to designate the type of fit test:

QL = Qualitative
QT = Quantitative

[__] Mark (X) this box if you attach a continuation sheet.

9.17 Respirator Training Program -- Describe your respirator training and re-training programs for each type of respirator used when working with the listed substance. Photocopy this question and complete it separately for each respirator type.

a. N/A

Respirator type ..... _____

Type of Training[1]	Number of Workers Trained	Location of Training[2]	Length of Training (hrs)	Person Performing Training[3]	Frequency[4]

b.

Respirator type ..... _____

Type of Re-training[1]	Number of Workers Re-trained	Location of Re-Training[2]	Length of Re-Training (hrs)	Person Performing Re-Training[3]	Frequency[4]

[1]Use the following codes to designate the type of training or re-training:

E = Emergency
R = Routine

[2]Use the following codes to designate the location of training or re-training:

A = Outside plant instruction
B = In-house classroom instruction
C = On-the-job
D = Other (specify) _____

[3]Use the following codes to designate the person who performs the training or re-training:

A = Plant industrial hygienist
B = Supervisor
C = Foreman
D = Other (specify) _____

[4]Use the following codes to designate the frequency of respirator training or re-training:

A = Monthly
B = Fixed monthly
C = Other (specify) _____

[ ] Mark (X) this box if you attach a continuation sheet.

PART E WORK PRACTICES

9.19 Describe all of the work practices and administrative controls used to reduce or eliminate worker exposure to the listed substance (e.g., restrict entrance only to authorized workers, mark areas with warning signs, insure worker detection and monitoring practices, provide worker training programs, etc.). Photocopy this
CBI question and complete it separately for each process type and work area.

[ ] N/A

Process type ..... _____

Work area ..... _____

_____

_____

_____

_____

9.20 Indicate (X) how often you perform each housekeeping task used to clean up routine leaks or spills of the listed substance. Photocopy this question and complete it separately for each process type and work area.

Process type ..... N/A _____

Work area ..... _____

Housekeeping Tasks	Less Than Once Per Day	1-2 Times Per Day	3-4 Times Per Day	More Than 4 Times Per Day
Sweeping				
Vacuuming				
Water flushing of floors				
Other (specify)				
_____				

[ ] Mark (X) this box if you attach a continuation sheet.

9.24 Who is responsible for safety and health training at your facility? Circle the appropriate response.

Plant safety specialist 1

Insurance carrier 2

OSHA consultant 3

Other (specify) Environmental, Health and Safety Staff ..... (4)

9.25 Who is responsible for the medical program at your facility? Circle the appropriate response.

Plant physician ..... (1)

Consulting physician ..... (2)

Plant nurse ..... (3)

Consulting nurse 4

Other (specify) _____ 5

[ ] Mark (X) this box if you attach a continuation sheet.

10.02 Specify the exact location of your facility (from central point where process unit is located) in terms of latitude and longitude or Universal Transverse Mercader (UTM) coordinates.

Latitude ..... Not Available ____ ° ____ ' ____ "

Longitude ..... ____ ° ____ ' ____ "

UTM coordinates ..... Zone _____, Northing _____, Easting _____

10.03 If you monitor meteorological conditions in the vicinity of your facility, provide the following information.

Average annual precipitation ..... Not Available _____ inches/year

Predominant wind direction ..... _____

10.04 Indicate the depth to groundwater below your facility.

Depth to groundwater ..... _____ meters

10.05 For each on-site activity listed, indicate (Y/N/NA) all routine releases of the listed substance to the environment. (Refer to the instructions for a definition of Y, N, and NA.)

CBI [ ]

N/A

On-Site Activity	Environmental Release		
	Air	Water	Land
Manufacturing			
Importing			
Processing			
Otherwise used			
Product or residual storage			
Disposal			
Transport			

[ ] Mark (X) this box if you attach a continuation sheet.

10.07 Complete the following table for each process stream containing the listed substance as identified in your process block or residual treatment block flow diagram(s). Photocopy this question and complete it separately for each process type.

CBI

[__]

Process type ..... N/A

Process Stream ID Code	Media Affected[1]	Average Amount of Listed Substance Released[2]	Number of Batches/Year	Days of Operation/ Year

[1]Use the following codes to designate the media affected:

A = Air
B = Land
C = Groundwater
D = POTW
E = Navigable waterway
F = Non-navigable waterway
G = Other (specify) _____

[2]Specify the average amount of listed substance released to the environment and use the following codes to designate the units used to measure the release:

A = kg/day
B = kg/batch

[__] Mark (X) this box if you attach a continuation sheet.

PART B RELEASE TO AIR

10.09 Point Source Emissions -- Identify each emission point source containing the listed substance in terms of a Stream ID Code as identified in your process block or residual treatment block flow diagram(s), and provide a description of each point source. Do not include raw material and product storage vents, or fugitive emission sources (e.g., equipment leaks). Photocopy this question and complete it separately for each process type.

CBI

[ ]

N/A

Process type ..... _____

Point Source ID Code	Description of Emission Point Source
	Exhaust hood

[ ] Mark (X) this box if you attach a continuation sheet.

10.11 Stack Parameters -- Identify the stack parameters for each Point Source ID Code identified in question 10.09 by completing the following table.

CBI

[ ]

N/A Not Available

Point Source ID Code	Stack Height(m)	Stack Inner Diameter (at outlet) (m)	Exhaust Temperature (°C)	Emission Exit Velocity (m/sec)	Building Height(m)[1]	Building Width(m)[2]	Vent Type[3]

[1]Height of attached or adjacent building

[2]Width of attached or adjacent building

[3]Use the following codes to designate vent type:

H = Horizontal
V = Vertical

[ ] Mark (X) this box if you attach a continuation sheet.

PART C FUGITIVE EMISSIONS

10.13 Equipment Leaks -- Complete the following table by providing the number of equipment types listed which are exposed to the listed substance and which are in service according to the specified weight percent of the listed substance passing through the component. Do this for each process type identified in your process block or residual treatment block flow diagram(s). Do not include equipment types that are not exposed to the listed substance. If this is a batch or intermittently operated process, give an overall percentage of time per year that the process type is exposed to the listed substance. Photocopy this question and complete it separately for each process type.

CBI

[ ] Process type ..... N/A

Percentage of time per year that the listed substance is exposed to this process type ..... ____%

Equipment Type	Number of Components in Service by Weight Percent of Listed Substance in Process Stream					
	Less than 5%	5-10%	11-25%	26-75%	76-99%	Greater than 99%
Pump seals[1]						
Packed						
Mechanical						
Double mechanical[2]						
Compressor seals[1]						
Flanges						
Valves						
Gas[3]						
Liquid						
Pressure relief devices[4] (Gas or vapor only)						
Sample connections						
Gas						
Liquid						
Open-ended lines[5] (e.g., purge, vent)						
Gas						
Liquid						

[1] List the number of pump and compressor seals, rather than the number of pumps or compressors

10.13 continued on next page

[ ] Mark (X) this box if you attach a continuation sheet.

10.15 Equipment Leak Detection -- If a formal leak detection and repair program is in place, complete the following table regarding those leak detection and repair procedures. Photocopy this question and complete it separately for each process type.

CBI

N/A

[__] Process type ..... _____

Equipment Type	Leak Detection Concentration (ppm or mg/m^3) Measured at ____ Inches from Source	Detection Device[1]	Frequency of Leak Detection (per year)	Repairs Initiated (days after detection)	Repairs Completed (days after initiated)
Pump seals					
Packed					
Mechanical					
Double mechanical					
Compressor seals					
Flanges					
Valves					
Gas					
Liquid					
Pressure relief devices (gas or vapor only)					
Sample connections					
Gas					
Liquid					
Open-ended lines					
Gas					
Liquid					

[1]Use the following codes to designate detection device:

POVA = Portable organic vapor analyzer
FPM = Fixed point monitoring
O = Other (specify) _____

[__] Mark (X) this box if you attach a continuation sheet.

PART D RELEASE TO WATER

10.17 National Pollutant Discharge Elimination System (NPDES) Discharges -- Complete the following information for each body of water NPDES discharges are discharged into. If discharges are to more than one body of water, photocopy this question and complete it separately for each discharge.

CBI

[__]

N/A

Discharge source (stream ID code) ..... _____

Is discharge to a moving or standing body of water? Circle the appropriate response.

Moving body of water 1

Standing body of water 2

Estimated average base flow (moving) ..... _____ l/day

Estimated average volume (standing) ..... _____ l

Average volume of discharge from facility ..... _____ l/day

_____ days/year

Maximum volume of discharge from facility ..... _____ l/day

_____ days/year

Average concentration of listed substance in discharge .... _____ mg/l or ppm

Maximum concentration of listed substance in discharge .... _____ mg/l or ppm

10.18 Publicly Owned Treatment Works (POTW) -- Complete the following information for discharges containing the listed substance which are discharged to a POTW from your facility.

CBI

N/A

[__] Discharge source (stream ID code) ..... _____

Average volume of discharge from facility ..... _____ l/day

_____ days/year

Maximum volume of discharge from facility ..... _____ l/day

_____ days/year

Average concentration of listed substance in discharge .... _____ mg/l or ppm

Maximum concentration of listed substance in discharge .... _____ mg/l or ppm

[__] Mark (X) this box if you attach a continuation sheet.

10.20 Releases to Soils -- Complete the following information for up to three random soil core samples that were taken and analyzed for the listed substance during the reporting year. Report the concentrations of the listed substance determined by soil core monitoring studies/tests. Specify the distance from the facility that soil cores were taken, and indicate the soil type and sample depth of the soil cores. (Refer to the glossary for definitions of soil textures given in foo note 2.)

CBI

[ ]

N/A

Sample	Concentration (ug/kg) of Listed Substance (± % precision)	Distance from Plant (m)[1]	Soil Texture[2]	Sample Depth (cm)
1				
2				
3				

[1]Use the following code to designate if the sample was taken within the facility's boundary:

OS = On-site

[2]Use the following codes to designate soil texture:

A = Sand	G = Sandy clay loam
B = Loamy sand	H = Clay loam
C = Sandy loam	I = Silty clay loam
D = Loam	J = Sandy clay
E = Silty loam	K = Silty clay
F = Silt	L = Clay

10.21 Releases to Groundwater -- Complete the following information for up to three random samples of groundwater from monitoring wells during the reporting year that were analyzed for the listed substance. The average and maximum concentration refers to the listed substance.

CBI

[ ]

N/A

Sample	Distance from Plant (m)[1]	Well Depth (m)	Average Concentration (mg/l) (± % precision)	Maximum Concentration (mg/l) (± % precision)
1				
2				
3				

[1]Use the following code to designate if the sample was taken within the facility's boundary:

OS = On-site

[ ] Mark (X) this box if you attach a continuation sheet.

PART E NON-ROUTINE RELEASES

10.23 Indicate the date and time when the release occurred and when the release ceased or was stopped. If there were more than six releases, attach a continuation sheet and list all releases.

N/A

Release	Date Started	Time (am/pm)	Date Stopped	Time (am/pm)
1				
2				
3				
4				
5				
6				

10.24 Specify the weather conditions at the time of each release.

N/A

Release	Wind Speed (km/hr)	Wind Direction	Humidity (%)	Temperature (°C)	Precipitation (Y/N)
1					
2					
3					
4					
5					
6					

[ ] Mark (X) this box if you attach a continuation sheet.

10.27 Circle all appropriate responses relating to the cause and the effects of the release.

N/A

Release No. ..... _____

Cause of Release

Equipment failure 1

Operator error 2

Bypass condition 3

Upset condition 4

Fire 5

Unknown 6

Other (specify) _____ 7

Results of Release

Spill 1

Vapor release 2

Explosion 3

Fire 4

Other (specify) _____ 5

[__] Mark (X) this box if you attach a continuation sheet.

10.28 (continued)

c. Local

Agency [__]

Office [__]

Contact Person [__]

Address [__]
Street

[__]
City

[__][__]
State

Telephone Number ..... [__][__][__]-[__][__][__]-[__][__][__][__]

Date Notified ..... [__][__] [__][__] [__][__]
Mo. Day Year

Time Notified ..... [__][__][__][__] am/pm

10.29 For each of the proximities listed below, indicate whether the population living within that proximity was notified of, or evacuated because of the release. Specify who notified the population, the number of people evacuated, if any, and the date and time of day the evacuation began.

N/A

Release No. ..... _____

Proximity to the Release	Notified of Release (Y/N)	Notifying Person	Notifying Person's Telephone Number	Area Evacuated (Y/N)	Number of Persons Evacuated	Date and Time of Day Evacuation Began
1/4 mile						
1/2 mile						
1 mile						
Other (specify)						

[__] Mark (X) this box if you attach a continuation sheet.

10.33 Indicate which of the prevention practices and policies listed in question 10.32 were ineffective in preventing the release from reaching the environment.

Release No. N/A .....

10.34 Describe all repairs and/or preventive measures (management practices, operational changes, etc.) made to equipment or operations as a result of the release.

Release No. N/A .....

10.35 Describe additional preventive measures that will be taken to minimize the possibilities of recurrence.

Release No. N/A .....

[ ] Mark (X) this box if you attach a continuation sheet.

APPENDIX II: Substantiation Form and Instructions to Accompany Claims of Confidentiality Under the Comprehensive Assessment Information Rule (CAIR)

If you assert one or more claims of confidentiality for information submitted on a Comprehensive Assessment Information Rule (CAIR) form, please answer, pursuant to 40 CFR 740.219, all the following questions in the space provided. Type all responses. If you need more space to answer a particular question, please use additional sheets. If you use additional sheets, be sure to include the section, number, and (if applicable) subpart of the question being answered, and write your facility's name and Dun & Bradstreet Number in the lower right-hand corner of each sheet. A completed copy of this form must accompany all submissions containing one or more claims of confidentiality. Failure to do so will result in the waiver of your claim of confidentiality.

EPA has identified six information categories as those which encompass all claims of confidentiality. These are: Submitter identity (h); Substance identity (i); Volume manufactured, imported, or processed (j); Use information (k); Process information (l); and Other information (m). Respondents who assert a CBI claim on the reporting form must mark the letter(s) (h through m) that represent(s) the appropriate category(ies) of confidentiality in the box adjacent to the question, and answer the questions in this form.

Respondents who assert a CBI claim for information submitted under CAIR must also provide EPA with sanitized and unsanitized versions of their submissions. The unsanitized version must be complete and contain all information being claimed as confidential. The sanitized copy must contain only information not claimed as confidential. EPA will place the second copy of the submission in the public file. Failure to submit the second copy of the form at the time the respondent submits the reporting form containing confidential information or after receipt of a notice from EPA thereafter will result in a waiver of the respondent's claim of confidentiality.

Please indicate the CAS Registry Number (if known) or chemical name (if the CAS Registry Number is not known) for the substance that is the subject of this form:

_____

If you are reporting on a tradename, please provide the tradename for the substance that is the subject of this form:

_____

Does this form contain CBI? [ ] Yes [X] No

If the answer to this question is yes, you must bracket the text claimed as CBI. Any unbracketed information may be placed in the public file.

[ ] Mark (X) this box if you attach a continuation sheet.

---

(5) If the information you wish to claim as confidential were to be disclosed to the public by EPA, how much difficulty would a new competitor have in entering the market for this substance, considering such constraints as capital and marketing costs, specialized marketing expertise, or unusual production processes?

(6) Has EPA, another Federal agency, or a Federal Court made any pertinent confidentiality determinations for information regarding this substance?

[ ] Yes [ ] No

If so, please identify the entity and provide EPA with copies of such determinations.

B. Submitter Identity (code h). Respondents who assert CBI claims for submitter identity must also answer the following questions:

(1) Approximately how many competitors do you have in the market for this substance or the final product containing this substance?

(2) What harm, if any, would result from EPA's disclosure of the submitter identity? Provide detailed descriptions of both the probable harm from disclosure and the causal relationship between disclosure and harm.

(3) If you have also asserted a claim of confidentiality for substance identity, what harm to your company's competitive position would result from disclosure of your company's identity if the substance identity were to remain confidential?

[__] Mark (X) this box if you attach a continuation sheet.

(c) If the substance is formulated with other chemicals, list them, and state the concentration of the claimed substance in the mixture.

(3) (a) If the substance leaves the site in a product that is available to the public or your competitors, can the substance be identified by analysis of the product?

[ ] Yes [ ] No

(b) Is it likely that a competitor has attempted or will attempt to chemically analyze the substance?

[ ] Yes [ ] No

(c) Would the cost and difficulty of such analysis be great or small? Why?

(4) What harm, if any, would result from EPA's public disclosure of the specific chemical identity? Provide detailed descriptions of both the probable harm to your company from disclosure and the causal relationship between release and harm.

(5) Would public disclosure of the specific chemical identity reveal to your competitors the use of the substance or the process by which this substance is manufactured?

[ ] Mark (X) this box if you attach a continuation sheet.

(2) If you have also claimed substance identity as confidential and EPA keeps confidential the link between the substance identity and the use data, the substance identity will not be associated in any way with the use data. In this case, what harm to your company's competitive position would result from disclosing the use data? How could a competitor use this information? What is the causal relationship between the disclosure and the harm?

(3) If you have claimed neither submitter nor substance identity as confidential, what harm, if any, would result from release of your use information? Provide a detailed description of both the harm and the causal relationship between disclosure and harm.

F. Process information (code 1). Respondents who assert CBI claims for process information must also answer the following questions:

(1) If you have also claimed submitter identity as confidential and EPA keeps confidential the link between your company identity and process information, your identity will not be associated in any way with this information. In this case, what harm to your competitive position would result from disclosing the process information? How could a competitor use this information? What is the causal relationship between the disclosure and the harm?

(2) If you have also claimed substance identity as confidential and EPA keeps confidential the link between the substance identity and the process information, the substance identity will not be associated in any way with the process information. In this case, what harm to your company's competitive position would result from disclosing the process information? How could a competitor use this information? What is the causal relationship between the disclosure and the harm?

[ ] Mark (X) this box if you attach a continuation sheet.

I certify that I have personally examined and am familiar with the information submitted in this CBI Substantiation Form and all attached documents. Based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete.

NAME	SIGNATURE	DATE SIGNED

TITLE	( ) TELEPHONE NO.
	-

[ ] Mark (X) this box if you attach a continuation sheet.

CONAP-11 Updat

vapors or mist at concentrations above the TLV can irritate (burning sensation) the mucous membranes in the respiratory tract (nose, throat, lungs) causing runny nose, sore throat, coughing, chest discomfort, shortness of breath and reduced lung function (breathing obstruction). Persons with a preexisting, nonspecific bronchial hyperactivity can respond to concentrations below the TLV with similar symptoms as well as asthma attack. Exposure well above the TLV may lead to bronchitis. bronchial spasm and pulmonary edema (fluid in the lungs). These effects are usually reversible. Chemical or hypersensitive pneumonitis, with flu-like symptoms (e.g. fever, chills),has also been reported. These symptoms can be delayed up to several hours after exposure.

Ingestion:

ORAL,LD50 > 5800 mg/kg (Rats). Can result in irritation and corrosive action in the mouth, stomach tissue and digestive tract. Symptoms can include sore throat, abdominal pain, nausea, vomiting and diarrhea.

Eye Contact:

Strongly irritating (Rabbits) OECD Guidelines. Liquid, aerosols or vapors are severely irritating and can cause pain, tearing, reddening and swelling. If left untreated, corneal damage can occur and injury is slow to heal. however, damage is usually reversible.

Skin Contact:

Skin sensitizer in guinea pigs. One study with guinea pigs reported that repeated skin contact with TDI caused respiratory sensitization. Isocyanates react with skin protein and moisture and can cause irritation which may include the following symptoms: reddening, swelling, rash, scaling or blistering. Cured material is difficult to remove.

Skin Absorption:

ND

CHRONIC TOXICITY

Carcinogenicity:

--X-Yes: --X---NTP --X----IARC ----Federal OSHA

In a DRAFT of a lifetime bioassay, the National Toxicology Program reported that TDI caused an increase in the number of tumors in exposed rats over those counted in non-exposed rats. The TDI was administered by gavage where TDI was introduced into the stomach through a tube. In lifetime inhalation studies conducted by Hazelton Labs for the International Isocyanate Institute, TDI did NOT demonstrate carcinogenic activity in rats or mice.

Target Organ Affected:

No specific information available.

Effects of Overexposure:

CONAP-11 Update

Cover the spill with sawdust, vermiculite, Fuller's earth or other absorbent material. Pour decontamination solution over the spill area and allow to react for at least 10 minutes. Collect the material in open top containers and add additional amounts of decontamination solution. Remove containers to a safe place, cover loosely, and allow to stand for 24 to 48 hours. Wash down spill area with decontamination solutions. Decontamination solutions: non-ionic surfactant Union Carbide's Tergitol TMN-10(20%) and water (80%); or concentrated ammonia (3-8%), detergent (2%), and water (90%). During spill clean-up, a self contained breathing apparatus or air line respirator and protective clothing must be worn. (See section VIII).
Reportable Quantity CERCLA: 100lbs
Waste Disposal Method:
Dispose according to any Local, State and Federal Regulations.

========== VIII. SPECIAL HANDLING INFORMATION ==========

Respiratory Protection:
A positive pressure air-supplied respirator is required whenever TDI concentrations exceed the Short-Term Exposure or Ceiling Limit of .02ppm or exceed the 8 hour Time Weighted Average TLV of 0.005 ppm. An air supplied respirator must also be worn during spray application, even if exhaust ventilation is used. For non-spray , short-term(less than 1 hour) situations where concentrations are near the TLV, a full face, air-purifying respirator equipped with organic cartridges or canisters can be used. However, TDI has poor warning properties since the odor at which TDI can be smelled is substantially higher than the 0.02 ppm. Therefore, proper fit and timely replacement of filter elements must be ensured. Observe OSHA regulations for respirator use. (29CFR 1910.134).
Ventilation:
Local exhaust should be used to maintain levels below the TLV whenever TDI containing material is handled, processed, or spray-applied. At normal room temperatures (70 F) TDI levels quickly exceed the TLV unless properly ventilated. Standard reference sources regarding industrial ventilation (e.g.,ACGIH INDUSTRIAL VENTILATION) should be consulted for guidance about adequate ventilation.
Protective Gloves:Chemical resistant gloves (butyl rubber, nitrile rubber, polyvinyl alcohol). However, please note that PVA degrades in water.
Eye Protection:
Liquid chemical goggles or full face shield should be worn. Contact lenses should not be worn.
Other Protective Clothing or Equipment:Safety showers and eyewash stations should be available. Cover as much of exposed skin as possible with appropriate clothing.

CONAP 11
Updat

Work Practices, hygienic practices
Educate and train employees in safe use of product. Follow all label instructions.

========== IX SPECIAL PRECAUTIONS ==========

Handling and Storage:
Store in tightly closed containers to prevent moisture contamination. Do not reseal if contamination is suspect.

Other Precautions:
Avoid contact with eyes and skin. Do not breathe the vapors.

========== X ADDITIONAL INFORMATION ==========

SARA Title III Requirements:
TDI is on the Extremely Hazardous Substance.

Chemical Name	Section: 302	CERCLA 313
Toluene 2,4 Diisocyanate	TPQ-500 LBS	RQ-100 LBS	YES

T.S.C.A. Status: On Inventory

==========

Name(print):George C. Karpin !This formulation is subject
Signature: George C. Karpin !to change without notice.
Title:Toxicological Coordinator!In case of accident use the
Date of last revision5/25/89!phone number provided.

To the best of our knowledge, the information contained herein is accurate and meets all state and federal guidelines. However,CONAP INC.does not assume any liability whatsoever for the accuracy or completeness of the information contained herein. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards which exist. Final determination of the suitability of any material is the sole responsibility of the user.

//

Date approved 5/26/89 Approved: [signature]
ND=Not Determined
NA=Not Applicable 5/26/89 Approved: [signature]